

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

GILDA HAGAN-BROWN

CASE NO.: 1:14-CV-01614

Plaintiff,

v.

ELI LILLY AND COMPANY, an Indiana corporation,

Defendant.

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JANINE ALI

CASE NO.: 1:14-CV-01615

Plaintiff,

v.

ELI LILLY AND COMPANY, an Indiana corporation,

Defendant.

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**DEFENDANT'S OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS**

Pursuant to the Court's Trial Orders in both of the above-captioned cases, dated June 24, 2015, Defendant Eli Lilly and Company ("Lilly") hereby submits objections to Plaintiffs' designated deposition testimony and supporting documentation. Each challenged transcript designation has been highlighted in yellow and the nature of the objection can be found in the margins. Consistent with the Court's Orders, supporting documentation has been submitted providing a short explanation of the dispute and why the designation is improper.

Lilly notes that it previously filed objections to Plaintiffs' exhibits. To the extent an exhibit is excluded by the Court, Lilly maintains that testimony regarding such exhibit must be excluded as well.

Dated July 15, 2015

Respectfully submitted,

/s/ Jeffrey Todd Bozman

Jeffrey Todd Bozman (VSB 83679)

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## CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of July, 2015, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Dated July 15, 2015

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